

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

ZEXI LI

Plaintiff /Moving Party

-and-

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN
DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11,
JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16,
JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21,
JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26,
JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31,
JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36,
JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41,
JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46,
JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51,
JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56,
JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

**AFFIDAVIT OF BENJAMIN DICHTER
(Sworn February 7, 2022)**

I, **Benjamin Dichter**, of City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am one of the Defendants herein, and as such have personal knowledge of the matters hereinafter deposed to.
2. I reside in the City of Toronto, Ontario and while I did invite truckers to come to Ottawa, Ontario to peacefully protest the Covid-19 vaccine mandates, there are many truckers that I do not know and never been in prior contact with. Based on my discussions with truckers and what I have seen by way of licence plates, there are truckers unknown to me that have come to Ottawa from all provinces and as far as the United States.
3. I do not control the truckers and other participants in the current protest in Ottawa, Ontario.
4. While I do own a truck, my truck is currently in Mississauga, Ontario, and has never been in Ottawa, Ontario.

SWORN REMOTELY by videoconference by)
 Benjamin Dichter, at the City of Toronto,)
 Ontario, before me at the City of Brampton,)
 this 7 day of February 2022 in accordance with)
 O. Reg. 431/20 Administering Oath or)
 Declaration Remotely)


 BENJAMIN DICHTER

Henna Parmar

Barrister & Solicitor, etc.

Plaintiff (Moving Party)

Defendants (Responding Parties)

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ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
BENJAMIN DICHTER

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS
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Keith Wilson (AB#: [REDACTED])

Eva Chipiuk (AB#: [REDACTED])

Allison Peiovic
[REDACTED]

Andre Memauroi (SK#: [REDACTED])

Counsel for the Defendants, Chris Barber, Benjamin
Dichter and Tamara Lich